

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR Gas Company	) ) ) )	D.T.E. 06-44
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**ATTORNEY GENERAL’S FIRST SET OF  
INFORMATION AND DOCUMENT REQUESTS**

- AG 1-1      Please provide copies of all documents not already provided that relate to the NSTAR Gas Company’s (“NSTAR” or “Company”) January 18, 2005 Request For Proposals (“RFP”) associated with the Company’s competitive solicitation process to procure gas supply. Include copies of all the initial request letter(s) sent to each bidder, and any updates in those letters, original RFPs, modification or amendments to the RFPs, and any responses sent by the RFP recipients to the Company. Include in this response all evaluations, studies, reports, correspondence, e-mails, notes, presentation materials, and work papers related to the RFP response. Identify the bidder to whom the contract was ultimately awarded.
- AG 1-2      Please refer to Exhibit (“Exh.”) MAG-1, page 19, lines 19-21. Provide all correspondence between the Company and Northeast Energy Associates, a Limited Partnership (“NEA”) regarding the permanent assignment of NEA’s upstream capacity from Lambertville. Explain how the assignment effected the Company’s selection of NEA’s bid as a winning bid on the January 18, 2005 RFP.
- AG 1-3      Please provide copies of all documents not already provided that relate to the January 18, 2005 RFP and the associated bid solicitation and evaluation process. Include copies of all the initial request letter(s) sent to each bidder, and any updates in those letters, original RFPs, modification or amendments to the RFPs, and any responses sent by the RFP recipients to the Company. Include in this response all evaluations, studies, reports, correspondence, e-mails, notes, presentation materials, and work papers related to the RFP response.

- AG 1-4 Please describe any RFP pre-bid conference that took place to allow RFP recipients an opportunity to ask questions about the RFP and describe any other opportunities that allowed recipients to receive clarification of the Company's terms and objectives stated in the RFP.
- AG 1-5 Please describe in detail the criteria that the Company used to evaluate bids, provide that criteria, and state whether the Company sent the evaluation criteria and an explanation of the criteria to all RFP recipients.
- AG 1-6 Please provide a detailed explanation of the criteria that the Company used to develop the list of RFP recipients.
- AG 1-7 State whether the Company requested bidders to refresh bids at any time? Please explain.
- AG 1-8 Has the Company acquired the gas supply for the Dartmouth capacity? If yes, please provide a copy all contracts related to the supply acquisition and a copy of the Department's approval of these contracts. If no, how and when will the Company acquire the gas resource for the Dartmouth capacity? Please provide supporting documentation.
- AG 1-9 Please provide copies of all the forecast resource and requirements tables and schedules found in the Company's 2005 Resource Plan ("Forecast"), not already provided, that show a need for incremental supply and capacity that the Company will acquire through the Proposed Agreement. Include forecast tables and schedules under normal weather conditions, and design winter, cold snap and design-day conditions.
- AG 1-10 Please provide updates to all the forecast resource and requirements tables and schedules found in the Company's Forecast showing the Company's resources and requirements for the forecast period under normal weather conditions, design year and design day conditions. Provide a breakdown of the resources by supply source (storage withdrawal, long haul pipeline, Canadian supply, market area purchase, citygate supply, etc.). For each supply resource identify the contracting party, the volume under contract, the termination date of the contract, and the DTE docket number and date of the DTE approval.
- AG 1-11 Please explain, in detail, the Company's policy for updating its forecast resource and requirements tables and schedules found in the Company's Forecast, and provide any written policy.

- AG 1-12 Identify (a) the employees and titles who determine when to update the Company's resource and requirements forecast and (b) the circumstances that would lead the Company to hire an outside consultant to prepare the resource and requirements forecasts or any part of a forecast?
- AG 1-13 When will the Company submit an update to its Forecast to the Department for approval under G.L. c. 164, § 69I. Please provide the Company's justification for the planned submission date.
- AG 1-14 Please identify any difference between the forecasted growth in demand predicted in the Forecast at the time the Company filed it, and the current need. Provide all supporting data for the Company's four service areas.
- AG 1-15 Please provide the proportion that the supply in the Proposed Agreement represents in the Company's:
- (a) total commodity resource portfolio; and,
  - (b) design-day requirement; and,
  - (c) seasonal requirements.
- AG 1-16 Please provide complete copies of all of the Cost of Gas Adjustment ("CGA") filings that the Company made for the period 2002 to 2006.
- AG 1-17 Please provide all documentation supporting the sales and throughput volumes that the Company used in the calculation of the seasonal CGA for the period 2002-2006. Breakdown the volumes by customer rate class and include a firm special contracts class.
- AG 1-18 Please provide copies of the Company's annual sales estimates provided in the Company's two most recent Forecasts filed with the Department. Breakdown the volumes by customer rate class, and include a firm-special contracts class. Show the volumes for transportation-only customers for all scenarios, *i.e.* normal year, design year, expected load growth, high load growth, low load growth, etc.
- AG 1-19 Please provide a copy of every annual sales estimate for the Company produced either internally or by consultants for the period 2002 to 2006. Breakdown the volumes by customer rate class, and include a firm-special contracts class to show volumes for transportation-only customers class. Provide all supporting documentation, workpapers, calculations, and assumptions.
- AG 1-20 Please provide actual monthly and annual sales by customer rate class for the period 2002 to 2006. Include a firm-special contracts class and show the volumes for transportation-only customers separately for each class. Provide the data requested as an Excel spread sheet.

- AG 1-21 Please provide monthly and annual weather normalized sales for the period 2002 to 2006 for each customer rate class. Include a firm-special contracts class and show the volumes for transportation-only customers separately for each class. Provide all supporting documentation, calculations, workpapers, and assumptions. and provide the data requested in the form of a working Excel spreadsheet model with all cell references and formulas in tact.
- AG 1-22 Please refer to Exhibit (“Exh.”) MAG-1 at 9-11. Identify the deficiencies in the Company’s supply for design-winter and design-day requirements that the Company expects after acquiring the supplies via the Proposed Agreement.
- AG 1-23 State the Company’s plans to make up the deficiencies identified in the Company’s response to AG 1-23.
- AG 1-24 Please refer to Exh. MAG-1 at 8, line 9. State the quantity of gas that the Company will pay for and explain who will determine the quantity of gas for payment and how that person or entity will determine that quantity.
- AG 1-25 Please refer to Exh. MAG-1 at 8, lines 11-12. Provide the DTE Gass Tariff and identify the minimum and maximum rights and obligations in the tariff.
- AG 1-26 Please refer to Exh. MAG-1 at 12, lines 9-11. Explain in detail why the ability to nominate various volumes is very important in serving the NSGAR Gas Load. Provide supporting documentation.

DATED: June 28, 2006